

# EXHIBIT H

**Laurie E. Morrison, Esq.**

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**From:** Welch, Nicole A. <nicole.welch@ogletree.com>  
**Sent:** Monday, March 19, 2018 5:21 PM  
**To:** Laurie E. Morrison, Esq.  
**Cc:** Warshaw, Aaron  
**Subject:** Washington v. Walgreens  
**Attachments:** Washington - Defendants\_ Responses and Objections to Plaintiff\_s Post-Deposition Requests.PDF; DR 002441-DR 002445.pdf; DR 002446-DR 002675.pdf; DR 002676-DR 002690.pdf; DR 002691-DR 002701.pdf; Washington - Ltr to Laurie Morrison encl. doc production 2018-03-19.pdf

Laurie,

Please find attached Defendants' Responses and Objections to Plaintiff's requests made during and after the defenses witnesses' depositions. Defendants' supplemental document production bearing Bates numbers DR 002441-2701 is also attached.

Today we also sent you a disc containing additional medical records received from Plaintiff's healthcare providers, Bates-stamped DR 000852-2440.

Thank you,  
Nicole

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**Reporting Party [?] (1)**

First Name [REDACTED]  
 Middle Name [REDACTED]  
 Last Name [REDACTED]  
 Employee ID [REDACTED]  
 Job Title [REDACTED]

Witness [?] Yes

**Witness [?] (2)**

First Name [REDACTED]  
 Middle Name [REDACTED]  
 Last Name [REDACTED]  
 Employee ID [REDACTED]  
 Job Title [REDACTED]

First Name [REDACTED]  
 Middle Name [REDACTED]  
 Last Name [REDACTED]  
 Employee ID [REDACTED]  
 Job Title [REDACTED]

Person with Knowledge [?] No

Parent or Guardian No

Person Acting in Concert (If not already documented as an additional Subject) [?]

Victim [?] No

**Allegation(s)**

Subject of Allegation	Allegation	Specific Type	Method	Allegation Status
[REDACTED] ALLEN (Subject Information)	Employee Treatment/Conduct	Harassment Policy	Gender / Sex	Undetermined
[REDACTED] ALLEN (Subject Information)	Theft or Fraud	Payroll Fraud	Wage and Hour Manipulation by Team Member	Confirmed

**Subject Disposition**

\* Did you interview the Subject? Yes

Date Interviewed 6/3/2016

Did You Have a Witness for the Interview? Yes

First Name of Witness:

Last Name of Witness:

\* Was the Subject Suspended? Yes

\* Final Subject Disposition Terminated

Separation Date 6/6/2016

If the Subject was interviewed, did the person who witnessed the interview also inform the employee of termination? No

\* First Name of Person Informing Employee of Termination

Last Name of Person Informing Employee of Termination

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Case No.  
TEASIA MARTIN,

Plaintiff,

**COMPLAINT**

-against-

**PLAINTIFF DEMANDS  
A TRIAL BY JURY**

WALGREEN CO., DUANE READE INC.,  
ALAMGIR KABIR, *Individually*,  
MICHAEL GEYER, *Individually*,  
VIVIAN GHOBRIAL, *Individually*, and  
MIKE CONWAY, *Individually*,

Defendants.  
-----X

Plaintiff, TEASIA MARTIN, by her attorneys, PHILLIPS & ASSOCIATES, Attorneys at  
Law, PLLC, hereby complains of the Defendants, upon information and belief, as follows:

**NATURE OF THE CASE**

1. Plaintiff complains pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166 (“Title VII”), and the New York City Human Rights Law, New York City Administrative Code §8-502(a), *et. seq.* (“NYCHRL”), and seeks damages to redress the injuries Plaintiff has suffered as a result of being **Discriminated Against** on the basis of her **Race (African-American/Black)** and **National Origin (American)** and **Retaliated Against** by her employer solely for complaining of discrimination.

**JURISDICTION AND VENUE**

2. Jurisdiction of this Court is proper under 42 U.S.C. §2000e-5(f)(3), and 28 U.S.C.